

FILED

JUN 26 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY MR

DEPUTY

UNITED STATES OF AMERICA

v.

Raymond Fooze§
§
§
§
§

Cause No.

23-MJ-00173MOTION TO DETAIN

COMES NOW the United States of America by and through the United States Attorney for the Western District of Texas, by and through the undersigned Assistant United States Attorney and moves the Court to detain the above named Defendant without bail and for cause would show the following:

- (A) The Defendant is charged with a crime of violence, a human trafficking offense under 18 USC 1591, or a terrorism offense under 18 USC 2332b(g)(5)(B), for which a maximum term of imprisonment of ten years or more is prescribed;
- (B) The Defendant is charged with an offense for which the maximum sentence is life imprisonment or death;
- (C) The Defendant is charged with an offense for which a maximum term of imprisonment of ten years or more is prescribed by the controlled Substances Act (21 USC 801 et seq.), or the Controlled Substances Import and Export Act (21 USC 951 et. seq.);
- (D) The Defendant is charged with a felony offense and has been convicted of two or more prior offenses described in paragraphs A-C above, or two or more State offenses that would have been offenses described in paragraphs A-C above if Federal jurisdiction had existed, or a combination of such offenses;
- (E) The Defendant is charged with an offense that involves a minor victim; or involves the possession or use of a firearm, destructive device, or any other dangerous weapon; or involves a failure to register under Title 18, United States Code, Section 2250;
- (F) A serious risk exists that the accused will flee; and/or
- (G) A serious risk exists that the Defendant will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate or attempt to threaten, injure, or intimidate a prospective witness or juror;

The Government requests that a hearing of this motion be conducted:

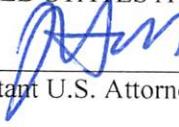
- Immediately;
- After a continuance of three (3) days at the request of the Government.

WHEREFORE, premises considered, the United States prays that the Court conduct a hearing to determine whether the Defendant(s) should be detained without bail pending trial, and, further the Government prays that the Defendant(s) be detained without bail pending trial.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

By:


Assistant U.S. Attorney